

1 Mark C. Mao, CA Bar No. 236165
2 Beko Reblitz-Richardson, CA Bar No. 238027
3 Erika Nyborg-Burch, CA Bar No. 342125
4 BOIES SCHILLER FLEXNER LLP
4 44 Montgomery St., 41st Floor
5 San Francisco, CA 94104
5 Tel.: (415) 293-6800
5 mmao@bsfllp.com
6 brichardson@bsfllp.com
6 enyborg-burch@bsfllp.com
7
7 James Lee (admitted *pro hac vice*)
8 Rossana Baeza (admitted *pro hac vice*)
9 BOIES SCHILLER FLEXNER LLP
9 100 SE 2nd St., 28th Floor
10 Miami, FL 33131
10 Tel.: (305) 539-8400
11 jlee@bsfllp.com
11 rbaeza@bsfllp.com
12
12 Amanda K. Bonn, CA Bar No. 270891
13 SUSMAN GODFREY L.L.P
13 1900 Avenue of the Stars, Suite 1400
14 Los Angeles, CA 90067
14 Tel: (310) 789-3100
15 Fax: (310) 789-3150
16 abonn@susmangodfrey.com
17
17 *Attorneys for Plaintiffs*
18
18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20
20 CHASOM BROWN, WILLIAM BYATT,
21 JEREMY DAVIS, CHRISTOPHER
22 CASTILLO, and MONIQUE TRUJILLO
23 individually and on behalf of all similarly
23 situated,
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24 Plaintiffs,
25
25 vs.
26
26 GOOGLE LLC,
27
27 Defendant.

1 William Christopher Carmody
1 (admitted *pro hac vice*)
1 Shawn J. Rabin (admitted *pro hac vice*)
1 Steven M. Shepard (admitted *pro hac vice*)
1 Alexander Frawley (admitted *pro hac vice*)
1 SUSMAN GODFREY L.L.P.
1 1301 Avenue of the Americas, 32nd Floor
1 New York, NY 10019
1 Tel.: (212) 336-8330
1 bcarmody@susmangodfrey.com
1 srabin@susmangodfrey.com
1 sshepard@susmangodfrey.com
1 afrawley@susmangodfrey.com
2
2 John A. Yanchunis (admitted *pro hac vice*)
2 Ryan J. McGee (admitted *pro hac vice*)
3 MORGAN & MORGAN
3 201 N. Franklin Street, 7th Floor
3 Tampa, FL 33602
3 Tel.: (813) 223-5505
3 jyanchunis@forthepeople.com
3 mram@forthepeople.com
3 rmcgee@forthepeople.com
4
4 Michael F. Ram, CA Bar No. 104805
5 MORGAN & MORGAN
5 711 Van Ness Ave, Suite 500
5 San Francisco, CA 94102
5 Tel: (415) 358-6913
5 mram@forthepeople.com

1 Case No.: 4:20-cv-03664-YGR-SVK

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2 **PLAINTIFFS' MOTION RE: SEALING**
2 **PORTIONS OF PLAINTIFFS'**
2 **SUPPLEMENT IN SUPPORT OF**
2 **REQUEST FOR AN ORDER FOR**
2 **GOOGLE TO SHOW CAUSE RE:**
2 **DISCOVERY MISCONDUCT**

3
3 The Honorable Susan van Keulen
3 Courtroom 6 – 4th Floor
3 Date: April 21, 2022

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC (“Google”)’s material should be sealed. This material is included in Plaintiffs’ Administrative Motion to File Supplement in Support of Their Motion for Order Requiring Google to Show Cause Why It Should Not Be Sanctioned for Discovery Misconduct (“Administrative Motion to File Supplement”). The material has been designated by Google as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.” This motion to seal pertains to the following information in the Supplement.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Administrative Motion to File Supplement	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Declaration of Mark C. Mao in Support of Plaintiffs’ Administrative Motion to File Supplement (“Second Mao Decl.”)	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Exhibits 1-4 of the Second Mao Declaration	Google	Entirety	Material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: March 21, 2022

Respectfully submitted,

By: /s/ Mark Mao

Mark C. Mao (CA Bar No. 236165)

mmao@bsflp.com

Beko Rebitz-Richardson (CA Bar No. 238027)

brichardson@bsflp.com

Erika Nyborg-Burch (CA Bar No. 342125)

Enybrog-burch@bsflp.com

BOIES SCHILLER FLEXNER LLP

1 44 Montgomery Street, 41st Floor
2 San Francisco, CA 94104
3 Telephone: (415) 293 6858
4 Facsimile (415) 999 9695

5 James W. Lee (*pro hac vice*)
6 jlee@bsfllp.com
7 Rossana Baeza (*pro hac vice*)
8 rbaeza@bsfllp.com
9 BOIES SCHILLER FLEXNER LLP
10 100 SE 2nd Street, Suite 2800
11 Miami, FL 33130
12 Telephone: (305) 539-8400
13 Facsimile: (305) 539-1304

14 Amanda Bonn (CA Bar No. 270891)
15 abonn@susmangodfrey.com
16 SUSMAN GODFREY L.L.P.
17 1900 Avenue of the Stars, Suite 1400
18 Los Angeles, CA 90067
19 Telephone: (310) 789-3100

20 William Christopher Carmody (*pro hac vice*)
21 bcarmody@susmangodfrey.com
22 Shawn J. Rabin (*pro hac vice*)
23 srabin@susmangodfrey.com
24 Steven Shepard (*pro hac vice*)
25 sshepard@susmangodfrey.com
26 Alexander P. Frawley (*pro hac vice*)
27 afrawley@susmangodfrey.com
28 SUSMAN GODFREY L.L.P.
29 1301 Avenue of the Americas, 32nd Floor
30 New York, NY 10019
31 Telephone: (212) 336-8330

32 John A. Yanchunis (*pro hac vice*)
33 jyanchunis@forthepeople.com
34 Ryan J. McGee (*pro hac vice*)
35 rmcgee@forthepeople.com
36 MORGAN & MORGAN, P.A.
37 201 N Franklin Street, 7th Floor
38 Tampa, FL 33602
39 Telephone: (813) 223-5505
40 Facsimile: (813) 222-4736

41 Michael F. Ram, CA Bar No. 104805
42 MORGAN & MORGAN
43 711 Van Ness Ave, Suite 500
44 San Francisco, CA 94102
45 Tel: (415) 358-6913

1 mram@forthepeople.com
2 *Attorneys for Plaintiffs*
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5
6
7
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